

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY (CAMDEN)**

KRISTINE KEYES
Plaintiff,

v.

NATIONSTAR MORTGAGE, LLC, et al.

Defendants

DOCKET NO.: 1:20-cv-02649-NLH-KMW

PLAINTIFFS' MOTION FOR EXTENSION OF TIME PURSUANT TO F.R.C.P. 6

1. Plaintiffs hereby request a brief extension of time to respond to the motions docketed at 17 until June 1, 2020 or for motions docketed at 17 and 21 to be stayed until the motion for remand has been ruled on.
2. The motion to dismiss filed at 17 was filed on April 9, 2020.
3. Six days later, deadlines were set for that motion, along with the prior motion to dismiss at 13, and for the motion to remand docketed at 16.
4. They were all to be heard by Judge Noel L. Hillman by May 4, 2020, however that did not occur.
5. It is Plaintiff's belief that the motion to remand should be granted.
6. Nonetheless, Plaintiffs' counsel is requesting that the opposition for the motion at 17 be due by June 1, 2020, along with the motion filed at 21 as the responses will be substantially similar, or in the alternative, that the motion responses dates be stayed until after the motion to remand is ruled on.

7. Staying the motions would likely be the most expeditious route, as previously argued, there is no reason the case should not be remanded, as there is no reason for it be a Federal matter, so it should be remanded back to state court to be heard there.
8. Either way, no parties would be biased by either permitting a short extension, or staying the motions to dismiss opposition until the motion to remand is heard.
9. We appreciate the court's understanding in this matter.

As such, Plaintiffs request that an extension of time be granted for the opposition to the currently pending motion and/or that the oppositions be stayed pending the outcome of the motion to remand.

Dated: May 18, 2020

/s/ Joshua Thomas
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ORDER

It is hereby ordered by the court, that the oppositions to the motions to dismiss currently pending are stayed until the motion to remand is ruled on.

J.